

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ESTATE OF DEREK WILLIAMS JR.,
by SHARDAY ROSE, Special Administrator; and
TANIJAH WILLIAMS, DEREK WILLIAMS III, and
TALIYAH S. WILLIAMS, minors by their mother
and guardian SHARDAY ROSE,

Plaintiffs,

v.

Case No. 16-C-869

CITY OF MILWAUKEE, and Milwaukee Police
Officers JEFFREY CLINE, RICHARD TICCIONI,
PATRICK COE, JASON BLEICHWEHL,
ROBERT THIEL, TODD KAUL,
ZACHARY THOMS, GREGORY KUSPA,
CRAIG THIMM, CHAD BOYACK, and
DAVID LETTEER,

Defendants.

**AFFIDAVIT OF SUSAN E. LAPPEN IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE**

STATE OF WISCONSIN)
) ss:
MILWAUKEE COUNTY)

SUSAN E. LAPPEN, being first duly sworn upon oath, does depose and state as follows:

1. I am an Assistant City of Attorney for the City of Milwaukee, and I have been assigned to represent the defendants in this case.
2. I have personal knowledge of the information averred to herein.

3. Attached as Exhibit CG-1 is a copy of a May 4, 2017 opinion letter, which apparently was signed by Consuelo Gonzalez on May 7, 2017, and which was received by the undersigned on May 8, 2017.

4. Attached as Exhibit CG-2 is a copy of an article posted on the internet, titled “Oxford University researches partnered with google on a new AI tool that reads lips, and the results were significant,” by Conner Forrest/November 23, 2016, 8:16 A.M. PST.

5. Attached as Exhibit CG-3 is an article posted on the internet, titled “Forensic speech reading,” from Wikipedia, last edited on 14 December 2016, at 13:34.

6. Attached as Exhibit CG-4 is an article titled “LipNet: End-to-End Sentence-Level Lipreading,” by Yonniss M. Assael, Brendan Shillingford, Shimon Whiteson, and Nadode Freitas in Google Deep Mind, London, UK, under review as a conference paper at LCLR 2017.

7. Attached as Exhibit RC-1 is a copy of the 25-page opinion letter of Roger A. Clark, which is dated May 8, 2017, and which was received by the undersigned on May 8, 2017.

8. Attached as Exhibit RC-2 is a copy of Mr. Clark’s six-page resume or CV, which was received by the undersigned along with Mr. Clark’s opinion letter on May 8, 2017.

9. Attached as Exhibit RC-3 is a copy of a May 5, 2017 one-page fee schedule of Mr. Clark, which was received by the undersigned along with Mr. Clark’s opinion letter on May 8, 2017.

10. Attached as Exhibit RC-4 is a copy of the 25-page “Updated List of Sworn Testimony for Rule 26” which I received along with Mr. Clark’s opinion letter, on May 8, 2017.

11. Attached as Exhibit RC-5 is a copy of excerpts from the May 30, 2017 evidentiary deposition of Mr. Clark.

12. Attached as Exhibit TT-1 is a copy of the four-page May 2, 2017 opinion letter of Trevonne M. Thompson, MD, which I received on May 8, 2017.

13. Attached thereto as Appendix 1 is a copy of Dr. Thompson’s 21-page CV, as well as Appendix 2, which is a copy of Dr. Thompson’s two-page listing of items which he reviewed in the context of his expert work in this case.

14. Attached as Exhibit TT-2 is a copy of Attorney Elson’s May 8, 2017 email to me, wherein he presents Dr. Thompson’s fee schedule.

15. Attached as Exhibit TT-3 is a true and correct copy of the transcript generated by the June 1, 2007 deposition of Dr. Thompson.

Dated at Milwaukee, Wisconsin this 7th day of June, 2017.

s/SUSAN E. LAPPEN
SUSAN E. LAPPEN

Subscribed and sworn to before me
this 7th day of June, 2017.

/Cynthia Reynolds
State of Wisconsin, Notary Public
My Commission expires 1/24/2021

1032-2016-1482/239968